

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BRIAN ESTEP,	:	CIVIL ACTION
	:	
Plaintiffs,	:	Case No.: _____
	:	
v.	:	
	:	
ALLEGHENY COUNTY, JOHN DOE,	:	
PATRICK JENNINGS,	:	
	:	
Defendants.	:	
	:	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant, Patrick Jennings (“**Jennings**”), respectfully notifies this court that he has removed the above-captioned action from the Court of Common Pleas of Allegheny County, Pennsylvania, Case No. G.D. 24-14608, to the United States District Court for the Western District of Pennsylvania. The grounds for removal are as follows:

1. This action is being removed to the United States District Court for the Western District of Pennsylvania based upon original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1441(a).
2. On, December 12, 2025, Plaintiff, Brian Estep (“**Plaintiff**”), commenced this civil action by filing a Civil Action Complaint against Defendants in the Court of Common Pleas of Allegheny County, Pennsylvania. A copy of the Civil Action Complaint is attached hereto and incorporated by reference as **Exhibit “1.”**
3. The case was styled *Brian Estep v. Allegheny County; John Doe*; Docket No. G.D. 24-14608 (the “State Court Action”).
4. On January 2, 2025, Defendant, Patrick Jennings, was served with the Complaint in the State Action. A copy of the Sheriff Return is attached as **Exhibit “2.”**

5. On January 7, 2025, the Allegheny County Defendant was served with the Complaint in the State Action. A copy of the Sheriff Return is attached as **Exhibit “3.”**

6. On January 20, 2025, the undersigned counsel entered his appearance on behalf of Jennings. A copy of the Praecipe for Entry of Appearance is attached hereto and incorporated by reference as **Exhibit “4.”**

7. As of January 21, 2025, there are no other pleadings of record in the State Court Action.

8. This court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1441(a) because Plaintiffs bring claims arising under the laws of the United States.

9. This court has original jurisdiction over Plaintiff’s federal claims without consideration of the amount in controversy and without regard to the citizenship of the parties.

10. This court also has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 to the extent Plaintiff’s Complaint purports to a state claim arising under: the Pennsylvania Human Relations Act (“PHRA”), 43 P.S. § 954, or Pennsylvania state constitutional claims, because the state law claim is so related to the federal claims that they form part of the same case or controversy.

11. Pursuant to 20 U.S.C. § 1441(a), the United States District Court for the Western District of Pennsylvania is the federal district court for the district embracing the place where the state court suite is pending.

12. Removal of this action is proper under 28 U.S.C. §§ 1331 and 1441(a).

13. In accordance with 28 U.S.C. § 1446(d), a true and correct copy of this Notice of Removal is being contemporaneously filed with the Court of Common Pleas of Allegheny County, Pennsylvania, and served upon Plaintiff’s counsel. A copy of the Notice of Filing of Notice of Removal (excluding exhibits) is attached hereto and incorporated by reference as **Exhibit “5.”**

14. Pursuant to 28 U.S.C. § 1446(a), a true and correct copy of all process and pleadings filed in the state court action are attached as Exhibits “1” through “5,” and to Defendants’ knowledge,

Plaintiffs have neither filed or served any other pleadings or papers with the Court of Common Pleas of Allegheny County, Pennsylvania, and that there are no matters pending in the state court action requiring resolution.

15. By this Notice of Removal, Defendant does not waive any objections they may have to service, personal jurisdiction, or venue, or any other defenses or objections it may have to this action.

16. Further, Defendant intends no admission of fact, law, or liability by this Notice of Removal and reserves all defenses, motions, and/or pleas.

17. Based upon the foregoing, Defendant respectfully prays it is entitled to have this case removed from the Court of Common Pleas of Allegheny County, Pennsylvania to the United States District Court for the Western District of Pennsylvania.

WHEREFORE, Defendant, Patrick Jennings, prays that the above-captioned matter be removed from the Court of Common Pleas of Allegheny County, Pennsylvania, to the United States District Court for the Western District of Pennsylvania.

Respectfully Submitted,

**DILLON McCANDLESS KING  
COULTER & GRAHAM, L.L.P.**

By: /s/ Jordan P. Shuber

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